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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-SC
MDL No. 1917

The Honorable Samuel Conti

This Document Relates to:

Individual Case No. 3:14-cv-02510

**DECLARATION OF ROSE YANG IN
SUPPORT OF PLAINTIFF VIEWSONIC
CORPORATION'S MEMORANDUM IN
OPPOSITION TO DEFENDANTS' JOINT
MOTION FOR SUMMARY JUDGMENT
BASED UPON FAILURE TO PROVIDE
EVIDENCE TO AVOID FTAIA BAR ON
FOREIGN COMMERCE**

1 I, Rose Yang, declare as follows:

2 1. I am the Director of Customer Care Compliance and Supply Management at
3 ViewSonic Corporation ("ViewSonic"). I have personal knowledge of the facts in this
4 declaration. If called as a witness, I could and would testify to the facts stated herein.

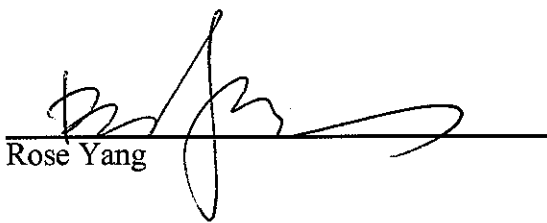
5 2. I submit this declaration in support of ViewSonic's Memorandum in Opposition
6 to Defendants' Joint Motion for Summary Judgment Based Upon Failure to Provide Evidence to
7 Avoid FTAIA Bar on Foreign Commerce.

8 3. The files produced by ViewSonic in the above-captioned litigation labeled
9 VIEW_CRT00000001 and VIEW_CRT00000002 contain transactional data maintained by
10 ViewSonic in the normal course of business reflecting ViewSonic's purchases of cathode ray tube
11 monitors for the years 1997 through 2008 (the "Data Files").

12 4. Each entry contained in the Data Files represents an occurrence where ViewSonic
13 issued a purchase order and paid for cathode ray tube monitors from the United States. Each such
14 purchase order would have listed ViewSonic's U.S. location in the "ship to" and "bill to" fields.
15 In addition, for each entry, title of the cathode ray tube monitors transferred directly from the
16 monitor supplier to ViewSonic.

17 5. None of the entries contained in the Data Files represent an occurrence where
18 ViewSonic International Corporation, or any other foreign subsidiary of ViewSonic, ordered,
19 acquired, purchased, paid for, or took possession or delivery of a cathode ray tube computer
20 monitor before it was shipped to ViewSonic in the United States.

21
22 I declare under penalty of perjury that the foregoing is true and correct. Executed this 19th
23 day of December, 2014 at Brea, California.

24
25 
26 Rose Yang